

FEDERAL COMMUNICATIONS COMMISSION
445 TWELFTH STREET SW
WASHINGTON DC 20554

MEDIA BUREAU
AUDIO DIVISION
APPLICATION STATUS: (202) 418-2730
HOME PAGE: www.fcc.gov/mb/audio/

ENGINEER: CHARLES N. (NORM) MILLER
TELEPHONE: (202) 418-2767
FACSIMILE: (202) 418-1410
E-MAIL: charles.miller@fcc.gov

April 19, 2011

Barry A. Friedman, Esq.
Thompson Hine LLP
1920 N Street NW, Suite 800
Washington, DC 20036-1600

Re: Gow Communications, LLC
KGOW (AM), Bellaire, Texas
Facility Identification Number: 17389
Special Temporary Authority

Dear Counsel:

This is in reference to the request filed April 18, 2011, on behalf of Gow Communications, LLC ("GC"). GC requests special temporary authority ("STA") to operate Station KGOW during daytime hours with parameters at variance.¹ In support of the request, GC states that, due to multiple failures of the existing folded unipole antenna system, it must convert its daytime array to a base-insulated, series-fed system. GC further states that it plans to increase the height of one of its daytime towers upon grant of its pending Application BP-20110131ARW, and requests that STA be extended until this task is completed.

Our review indicates that Station KGOW is licensed on the basis of a Method of Moments ("MOM") proof of performance pursuant to Section 73.151(c); therefore, it has no licensed monitor points with which to confirm proper operation of the directional pattern. STA will be granted for operation with parameters at variance from licensed values and reduced nominal power not to exceed 50% of licensed nominal power. Our review further indicates that, due to the nature of the work to be performed, it may be necessary for worker safety to operate with a temporary nondirectional antenna and reduced power. Although not requested, such operation is authorized on an "as necessary" basis.

Accordingly, the request for STA IS HEREBY GRANTED, with modification as discussed above. Station KGOW may operate during daytime hours with parameters at variance from licensed values and reduced nominal power not to exceed 25 kilowatts. Operation also is authorized during daytime hours with a temporary nondirectional antenna and reduced power not to exceed 12.5 kilowatts, only as necessary to facilitate the planned modifications to the antenna system. It will be necessary to further reduce power or cease operation if complaints of interference are received. GC must use whatever means are necessary to protect workers and the

¹ KGOW is licensed for operation on 1560 kHz with 50 kW daytime and 15 kW nighttime, employing separate transmitter sites and different directional patterns daytime and nighttime (DA-2-U). Application BP-20110131ARW proposes a decrease in daytime operating power to 46 kW and changes to the daytime directional pattern.

public from exposure to radio frequency radiation in excess of the Commission's exposure guidelines. *See* 47 CFR § 1.1310.

This authority expires on **October 19, 2011**.

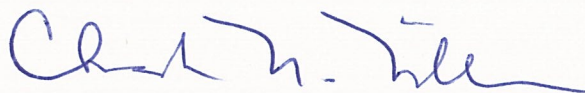
STA Advisory: Section 309(f) of the Communications Act of 1934, as amended, authorizes the Commission to grant STA in cases of "extraordinary circumstances requiring temporary authorizations in the public interest and when delay in the institution of the temporary operations would seriously prejudice the public interest." However, Section 309(f) is not a means by which a licensee/permittee may circumvent established processing procedures which require the filing of an application, nor is it a means by which a broadcaster may enhance his facility or make operation more convenient for the broadcaster. Stations operating with less than licensed facilities under temporary authorities can be viewed as receiving the benefit of a larger protection area than that in which they are currently providing service.

Accordingly, Special Temporary Authorities by nature are to be temporary and are not intended for extended use. Licensees of stations operating under temporary authorities are reminded that timely restoration of permanent facilities is the responsibility of the licensee and should be undertaken expeditiously. Any request for extension of special temporary authorities carries an increased burden with each subsequent request.

Therefore, requests for extension of STA will be granted only where the licensee can show that one or more of the following criteria have been met:

- Restoration of licensed facilities is complete and testing is underway;
- Substantial progress has been made during the most recent STA period toward restoration of licensed operation; or
- No progress has been made during the most recent STA period for reasons clearly beyond the licensee's control, and the licensee has taken all possible steps to expeditiously resolve the problem.

Sincerely,

A handwritten signature in blue ink, appearing to read "Charles N. Miller", with a stylized flourish at the end.

Charles N. Miller, Engineer
Audio Division
Media Bureau

cc: Gow Communications, LLC